

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in compliance with D.N.J. LBR 9004-1(b)

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Counsel to Arnold & Itkin LLP

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Chapter 11

Case No. 21-30589 (MBK)

**VERIFIED STATEMENT OF ARNOLD & ITKIN LLP
PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Arnold & Itkin LLP (“Arnold & Itkin”), representing (as the term “represent” is defined in Bankruptcy Rule 2019) those holders of talc personal injury claims identified on **Exhibit A-1** hereto (collectively, the “Arnold & Itkin Claimants”), hereby submits this verified statement (this “Verified Statement”), and in support hereof states as follows:

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

1. Each of the Arnold & Itkin Claimants has, individually, retained Arnold & Itkin to represent him or her as counsel in connection with, among other things, talc personal injury claims against the above-captioned debtor (the “Debtor”), its predecessor corporation and certain affiliated entities.

2. On October 15, 2021, Arnold & Itkin retained Pachulski Stang Ziehl & Jones LLP (“PSZ&J”), as bankruptcy counsel.

3. Arnold & Itkin does not represent the Arnold & Itkin Claimants as a “committee” or a “group” (as such terms are used in the Bankruptcy Code and the Bankruptcy Rules) and does not undertake to represent the interests of, and are not fiduciaries for, any creditor, party in interest, or other entity that has not signed a retention agreement with Arnold & Itkin.

4. The names of each of the Arnold & Itkin Claimants, as of the date of this Verified Statement, together with the nature and amount (which is unliquidated) of the disclosable economic interests held by each of them in relation to the Debtor, are set forth in **Exhibit A-1** attached hereto. **Exhibit A-1** also includes the home addresses and type of disease for each of the Arnold & Itkin Claimants but such information has been filed under seal.² However, Arnold & Itkin will provide such information to the Court and the United States Trustee, and, upon request and subject to appropriate confidentiality protections or protective orders, to counsel to the Debtor, counsel to the Official Committee of Talc Claimants, and counsel to the Future Talc Claimants Representative.

5. The information set forth in **Exhibit A-1** is based on information provided to Arnold & Itkin by the Arnold & Itkin Claimants and is intended only to comply with Bankruptcy Rule 2019 and not for any other purpose.

² See *Order Compelling Compliance With Fed. R. Bankr. P. 2019* [Docket No. 2352].

6. Each of the Arnold & Itkin Claimants have signed an engagement letter with Arnold & Itkin (the “A&I Engagement Letter”) and/or a consent to associate form if the Arnold & Itkin Claimants have signed an engagement letter with another law firm and such firm is associating with Arnold & Itkin (the “Consent to Associate Form”). Exemplars of the A&I Engagement Letter and Consent to Associate Form are attached at **Exhibit A-2** and verified as true and accurate copies signed by the Arnold & Itkin Claimants. The contingency fee percentage on the A&I Engagement Letter is redacted and filed under seal. However, Arnold & Itkin will provide such fee information under seal to the Court and the United States Trustee, and, upon request and subject to appropriate confidentiality protections or protective orders, to counsel to the Debtor, counsel to the Official Committee of Talc Claimants and counsel to the Future Talc Claimants Representative.

7. Attached hereto as **Exhibit A-3** is the engagement letter signed by Arnold & Itkin for the retention of PSZ&J as bankruptcy counsel (the “PSZ&J Engagement Letter”). No redactions have been made to the PSZ&J Engagement Letter.

8. Nothing contained in this Verified Statement is intended or shall be construed to constitute: (i) a waiver or release of the rights of any of the Arnold & Itkin Claimants to have any final order entered by, or other exercise of the judicial power of the United States performed by, an Article III court; (ii) a waiver or release of the rights of any of the Arnold & Itkin Claimants to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Judge; (iii) consent to the jurisdiction of the Court over any matter; (iv) an election of remedy; (v) a waiver of release of any rights any of the Arnold & Itkin Claimants may have to a jury trial, whether in state or federal court; (vi) a waiver or release of the right to move to withdraw the reference with respect to any matter or proceeding that may be commenced in these chapter 11 cases against or otherwise involving any of the Arnold & Itkin Claimants; (vii) a

waiver or release of any other rights, claims, actions, defenses, setoffs or recoupments to which any of the Arnold & Itkin Claimants are or may be entitled, in law or in equity, under any agreement or otherwise, with all such rights, claims, actions, defenses, setoffs or recoupments being expressly reserved; or (viii) a waiver or release of any of the Arnold & Itkin Claimants' rights under 28 U.S.C. § 157(b)(5) to have any of their personal injury tort or wrongful death claims tried in the district court in which the bankruptcy case is pending, or in the district court in the district in which the claim arose, as determined by the district court in which the bankruptcy case is pending.

9. Arnold & Itkin reserves the right to amend or supplement this Verified Statement in accordance with the requirements of the Bankruptcy Rule 2019 at any time in the future.

10. The undersigned verifies that the foregoing is true and correct to the best of its knowledge.

Dated: June 8, 2022

PACHULSKI STANG ZIEHL & JONES LLP

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